

### **REMARKS**

This Amendment and Response is responsive to the Office Action dated December 9, 2010, and Advisory Action Before the Filing of an Appeal Brief dated February 11, 2011. In the Office Action, Claims 1-2, 4-7, and 9-16 were rejected while claims 1-2, 4, 5, and 8 are objected to due to informalities.

### **REMARKS REGARDING CLAIM OBJECTIONS**

The Office Action objected to claims 1-2, 4-5, and 8 due to improper antecedent bases. Applicants thank the Examiner for catching these errors and have amended claims 1, 6, and 8 accordingly.

### **REMARKS REGARDING CLAIM REJECTIONS**

The Office Action rejected Claims 1-2, 4-7, 9-10, and 16 under §102(b) as being anticipated by Hughes US 5,950,744 (Hughes '744). The Office Action also rejects claims 11-12 and 15 under 35 U.S.C. § 103(a) as being obvious over Hughes '744, and rejects claims 13-14 as being obvious over Hughes '744 in view of Hughes US 2005/0023831 (Hughes '831).

Applicants appreciate the Examiner specifically referring to the Hughes embodiments that were bases for the rejections (e.g., Figs. 18 – 20). Applicants have carefully reviewed the cited references and have amended independent claims 1, 6, 7, and 9 to distinguish over the same. Particularly, Applicants have added the limitation of providing seals on the non-threaded interfaces between the collar and each of the first and second components. Applicants recognize and agree with the Examiner's contention that it is generally known to provide a seal on threaded connections. However, Applicants respectfully contend that due to the preferred requirement to maintain circumferential displacement (rotational) continuity between adjacent components in a connection (e.g., as between the first and second component members) to maintain proper alignment with respect to interconnecting passages and sub-components, such connections are preferably made up with limited or controlled amounts or torque. It may be desirable to avoid placing seal rings in the threaded segments of the connection. Thereby, it is preferable to Applicants' embodiments to provide the seal elements in non-threaded portions of the connections, as illustrated in Applicants' Figures 1, 2, 3, 5A, and 5B. Such feature is clearly demonstrated as germane to Applicants' preferred embodiments in each of the Figure

illustrations. Applicants respectfully point out that not only do none of Hughes' numerous figures or embodiments illustrate or discuss the need for such seals. Hughes fails to recognize the need for such components and by omission of such components in view of the numerous illustrations of fully threaded male and female threaded components actually teaches away from use of non-threaded-interface seal components. The embodiments taught and illustrated in Hughes fail to provide a non-threaded portion on any illustrated coupling components, thus failing to recognize the need or benefit of such components for improving the usefulness and operability of the invention. All illustrated embodiments of Applicants' couplings clearly illustrate the important, non-threaded internal portions on each of the male and female coupling components thereof. Respectfully, Hughes fails to recognize the need for such components.

Applicants appreciate the revised non-obviousness standard in view of *KSR*. In the *KSR* decision, the Supreme Court noted that *[t]he combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results. KSR v. Teleflex, 82 USPQ2d at 1395*. For at least the reasons enumerated in the immediately preceding paragraph (e.g., teaching away), Applicants respectfully contend that the claimed subject matter fails to support a PFC of obviousness. Additionally, Applicants respectfully contend that there is no motivation to combine Hughes with any general knowledge that seals are used to isolate various connections, included threaded connections. The need for the unique aspect of providing the seals at locations on the components that will not interfere with making up threads is not intuitively obvious as a majority of such threaded connections rely upon thread-engagement for the seal. However, Applicants have invented a superior improvement that provides a seal function that is independent from and remote to the thread components. Hughes failed to recognize or address a problem or need to improve upon the threads as seals. Applicants respectfully contend that there is no motivation in Hughes to combine Hughes with any additional teaching related to the sealing function and that for these reasons and the reasons stated in the previous paragraph, the claimed subject matter is thus non-obvious.

On page 6 of the Office Action, the Examiner provided that Claim 8 would be allowable if amended to overcome the previously stated objection. Applicants graciously appreciate the Examiner providing this notice and have so-amended Claim 8 to render the same allowable. Applicants have also provided herewith new Claims 26 – 28 as dependent claims to Claim 8.

In this Response, together with the prior Responses, Applicants have addressed each and all of the issues, objections, and rejections that were raised in the various Office communications. Applicants respectfully submit that each of the objections and rejections has been rendered moot and/or overcome by the foregoing amendments and remarks. In light of this Amendment and Response, Applicants submit that the present application is in condition for allowance and respectfully request reconsideration of the application in combination with this Amendment and Response. If the Examiner has any questions or if a telephone interview would in any way advance prosecution of the application, the Examiner is encouraged not to hesitate to contact the undersigned attorney of record.

Respectfully submitted,

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